

**BARRACK, RODOS & BACINE**

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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☒ Affects Both Debtors  
☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF SHEET METAL WORKERS'  
LOCAL #19 PENSION FUND TO  
SECURITIES LEAD PLAINTIFF'S  
OBJECTION TO REORGANIZED  
DEBTORS' MOTION TO APPROVE  
SECURITIES ADR AND RELATED  
PROCEDURES FOR RESOLVING  
SUBORDINATED SECURITIES CLAIMS  
[D.I. 9189]**

1 Sheet Metal Workers' Local #19 Pension Fund, the holder of a Securities Claim<sup>1</sup> and a  
2 creditor in the chapter 11 bankruptcy cases (the "**Chapter 11 Cases**") of the above-captioned  
3 reorganized debtors (the "**Debtors**", or as reorganized pursuant to the Plan, the "**Reorganized**  
4 **Debtors**"), by and through its undersigned counsel, submits this joinder ("**Joinder**") to  
5 *Securities Lead Plaintiff's Objection to Reorganized Debtors' Motion to Approve Securities ADR*  
6 *and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 9189] (the  
7 "**Securities ADR Objection**"), in opposition to *Reorganized Debtors' Motion to Approve*  
8 *Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket  
9 No. 8964] (the "**Securities ADR Motion**"). In support of this Joinder, Sheet Metal Workers'  
10 Local #19 Pension Fund, respectfully states as follows:

11 **JOINDER AND RESERVATION OF RIGHTS**

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13 1. Sheet Metal Workers' Local #19 Pension Fund is a Securities Claimant and timely  
14 filed proofs of claim against the Debtors by the Extended Bar Date (Claim Nos. PNQTC27423  
15 and N\$VCL27423).

16 2. Sheet Metal Workers' Local #19 Pension Fund incorporates by reference and hereby  
17 joins in all arguments set forth in the Securities ADR Objection.

18 3. Sheet Metal Workers' Local #19 Pension Fund reserves its right to supplement this  
19 Joinder and further reserves its rights to participate in any hearing to consider the Securities  
20 ADR Motion, including its rights to make any arguments and to examine witnesses.

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26 <sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities  
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as  
28 applicable.

1 **CONCLUSION**

2 For all of the foregoing reasons, Sheet Metal Workers' Local #19 Pension Fund  
3 respectfully requests that this Court enter an Order denying the Securities ADR Motion and  
4 granting such other and further relief as may be just and proper.  
5

6 Dated: October 6, 2020

**BARRACK, RODOS & BACINE**

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